UNITED STATES DISTRICT COURT for the District of New Jersey United States of America Case No. 10-1014 (AMD) NATHANIEL JOHNSON Defendant CRIMINAL COMPLAINT I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of _____ in the county of ____ in the ____ District of New Jersey , the defendant violated U. S. C. § ______, an offense described as follows: Including 18 U.S.C. Section 641 SEE ATTACHMENT A This criminal complaint is based on these facts: SEE ATTACHMENT B **d** Continued on the attached sheet. Complainant's signature BRIAN SHANNON, U.S. Postal Inspector Printed name and title Sworn to before me and signed in my presence.

City and state:

Camden, NJ

Judge's signature

Honorable Ann Marie Donio

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

Date: <u>April 30, 2010</u>

ATTACHMENT A

From in or about November 2009, through on or about April 30, 2010, in Camden, in the District of New Jersey and elsewhere, defendant

NATHANIEL JOHNSON, a/k/a "Nathaniel Brown,"

knowingly stole and converted to his own use things of value of the United States, that is, approximately sixty-seven United States Treasury Checks in the approximate amount of \$56,680, which had been stolen from the U.S. Mails and fraudulently cashed at various check cashing facilities in Camden, New Jersey, and elsewhere.

In violation of Title 18, United States Code, Section 641 and Title 18, United States Code, Section 2.

ATTACHMENT B

- I, Brian Shannon, a Postal Inspector with the United States Postal Inspection Service, having conducted an investigation, and having spoken with other individuals, have knowledge of the following facts:
- 1. From in or about November 2009 through the present, I have been involved in the investigation of Nathaniel Johnson, a/k/a "Nathaniel Brown," Lakisha Scanes, a/k/a "Lakisha Scanes Quijano," and others for activities related to their theft of U.S. Treasury and other checks from the U.S. mail, and their fraudulent cashing of such checks by obtaining and using fraudulent identification documents. During the course of the investigation, law enforcement officers have conducted more than 20 surveillances, more than 30 witness interviews and have collected more than 200 pages of documentary evidence, including fraudulently cashed state, federal and other checks, fraudulent identification documents, rental car agreements and bank records.
- 2. The investigation has revealed the defendants Johnson and Scanes have been running a fraudulent check cashing scheme from at least as early as November 2009, and continuing until the present. In general, Johnson and Scanes steal checks from the U.S. Mails from both residential mailboxes and U.S. Postal Service Mail vehicles. Then they recruit other individuals generally crack addicts and/or prostitutes from the streets of Camden (hereinafter "the check cashers") to cash the checks at various check cashing establishments. In order to cash the checks, Johnson and Scanes obtain false and fraudulent identification documents for the check cashers from various photo-identification businesses. Johnson and Scanes pay for the identification documents to be made in the name of the payees on the stolen checks, but the identification documents bear the photographs of the check cashers. Upon successful passing of a check, Johnson and Scanes pay the check casher a portion of the proceeds from the check.

LOSS AMOUNT

- 3. During the time period from on or about November 1, 2009, through on or about April 29, 2010, the investigation has revealed that Johnson and Scanes's fraudulent check cashing scheme has caused approximately \$88,000 in losses in the following amounts and pertaining to the following types of checks each of which had been stolen from the U.S. Mail:
 - a. Sixty-seven (67) United States Treasury Checks (most of which were for Social Security Benefits, others were for Veterans Benefits and Federal Income Tax Returns) in the approximate amount of \$56,680;
 - b. Forty (40) State of New Jersey Unemployment checks in the approximate amount of \$19,200; and
 - c. Fourteen (14) other checks in the approximate amount of \$11,500.

DESCRIPTION OF JOHNSON AND SCANES

- 4. Based upon surveillance, witness statements and public records, Johnson and Scanes live together in an apartment at 258 Branch Village, Camden, New Jersey, with two small children. Johnson is a black male with a beard, believed to be in his 40's, approximately 6'1" tall, and weighs approximately 170 pounds. Scanes is a black female, approximately 30 years old, approximately 5'2" tall, and weighing approximately 220 pounds.
- 5. Nathaniel Johnson, a/k/a Nathaniel Brown, has prior felony convictions, including convictions for:
 - a. Aggravated assault with a weapon in the Burlington County Superior Court on November 17, 2000; and
 - b. Possession of controlled dangerous substance on school property in the Camden County Superior Court on November 19, 2004.

THEFT OF MAIL FROM POSTAL VEHICLES

- 6. On the dates listed below from on or about December 19, 2009, through on or about January 29, 2010, there were eight incidents of individuals breaking the windows of U.S. Postal Service mail vehicles in Camden, New Jersey, and in seven instances stealing U.S. Mail from the vehicles.
 - a. On or about December 19, 2009, a U.S. Mail vehicle had its passenger window smashed out at the intersection of Minnesota and South Congress in Camden, New Jersey, while the carrier was delivering his assigned route. No mail was taken from the vehicle.
 - b. On or about December 26, 2009, a U.S. Mail vehicle had its passenger window smashed out, and approximately one tub of mail stolen on 2400 block of Wainwright in Camden, New Jersey, while the carrier was delivering her assigned route.
 - c. On December 31, 2009, a U.S. Mail vehicle had its passenger window smashed out, and two tubs of U.S. Mail stolen at 900 Woodland Avenue, in Camden, New Jersey, while the carrier was delivering her assigned route. A school security video captured images of an individual breaking the window of the U.S. Mail vehicle, removing a tub of mail, and getting into a dark colored SUV.

¹Generally, one tub of mail corresponds to approximately 100 to 200 pieces of mail.

- Later investigation revealed that from November 25, 2009 through January 15, 2010, Nathaniel Johnson rented a black Mazda SUV from Enterprise Rental.
- d. On or about January 9, 2010, a U.S. Mail vehicle had its passenger window smashed out at the 2300 block of Baird Avenue in Camden, New Jersey, while the carrier was delivering her assigned route. When law enforcement responded, they noticed the mail had been rifled through, and an Express Mail parcel had been taken.
- e. On or about January 11, 2010, at approximately 10:30 a.m., a U.S. Mail vehicle had its passenger window smashed out at the intersection of Euclid and Ormand Streets in Camden, New Jersey, while the carrier was delivering his assigned route. A witness, M.W., stated that he noticed a skinny black male with a full beard pull a hammer and bag out of his jacket, smash the window of the Mail vehicle, and take an undetermined amount of mail.
- f. On or about January 11, 2010, at approximately 4:00 p.m., a U.S. Mail vehicle had its passenger window smashed out at the intersection of North 28th and Arthur Streets, Camden, New Jersey, while the carrier was delivering his route. Approximately 200 mail pieces were taken. Law enforcement officers found a hammer inside the mail vehicle, but were unable to find any latent fingerprints on it.
- g. On January 22, 2010, a U.S. Mail vehicle had a window smashed out and two tubs of U.S. Mail were taken. Law enforcement officers interviewed a witness to the robbery, C.S., who stated that he/she observed a white 4-door small vehicle without license plates leaving the scene of the robbery.
 - i. During numerous later surveillances, law enforcement officers observed a white 4-door Acura Legend with a temporary paper license in the back tinted window and no license plates on the front and rear of the vehicle, parked in front of Johnson and Scanes' residence at 258 Branch Village, Camden, New Jersey.
- h. On January 29, 2010, a U.S. Mail vehicle had a window smashed out and two tubs of U.S. Mail were taken. An apartment security video captured images of a white 4-door vehicle which appeared like an Acura Legend fleeing the scene of the robbery.

IDENTIFYING VICTIMS

- 7. After each theft of mail from the U.S. Mail vehicles, law enforcement officers sent out letters to the residents in the affected areas asking them to call law enforcement if they were missing mail.
- 8. In addition, I contacted a law enforcement officer within the Social Security Administration and asked that he perform a search on the Social Security databases to determine whether any residents of the areas affected by the thefts had reported missing checks. In response, I received a listing of names and addresses of people who had reported missing checks, and copies of the backs of their cancelled checks, which revealed the location where they had been cashed. I noticed that a check cashing business located in Camden, Ben's Check Cashing, Inc., had cashed several of the missing checks.
- 9. On or about March 1, 2010, another law enforcement officer and I went to Ben's Check Cashing and interviewed the owner about the cashing of the missing checks. The owner pulled documentation pertaining to the cashing of some of the missing checks, which included a copies of the checks, identification documents for the check casher and surveillance photographs of the check casher. We noticed that the same form of identification (which is not a legitimate New Jersey issued ID) had been used to cash several of the missing checks. The owner of Ben's Check Cashing allowed us access to his computerized records, which allowed us to find additional checks in the affected areas during the time periods shortly following the thefts, which had been cashed using the same form of identification. In some instances, the records from Ben's Check Cashing showed the same check casher (as visibly identified from the photograph on the identification document and from the surveillance photograph) cashing checks in different payee's names by presenting photo identification in each payee's name and address.

SURVEILLANCES

- 10. In light of the thefts, law enforcement conducted various surveillances of U.S. Mail vehicles in an attempt to catch the perpetrators.
- During one of those surveillances, on or about February 1, 2010, law enforcement officers observed an Hispanic or light skinned African American male with a black hooded sweatshirt approach a postal vehicle at the intersection of Rand and Baird Boulevard in Camden, New Jersey. The male looked into the windows of the U.S. Mail vehicle, and then proceeded down the alley and returned a few seconds later to the postal vehicle with a second man, a thin black male. The second man then looked into the postal vehicle while the first man walked to the corner of the street. Both males then walked back down the alley and got into a newer model Dodge Magnum bearing Illinois license plates G692372. Officers determined that a 2009 Dodge Magnum, Illinois Registration No.

G692372 was registered to Alamo Car Rental, and had been rented to "Nathaniel Brown" on January 22, 2010, from the Enterprise Rental Car in Raleigh, North Carolina. At the time he rented the car, Nathaniel Brown supplied a North Carolina drivers license # 352-488-31-NC, bearing a date of birth of April 13, 1968, and an address of 2461 Stephenson Drive, Raleigh, North Carolina 27610. I have obtained a copy of Nathaniel Brown's North Carolina drivers license used to rent the car, and the person depicted in the photograph on that license is the person I know to be Nathaniel Johnson, a/k/a "Nathaniel Brown."

- 12. Law enforcement officers conducted numerous surveillances on Johnson and Scanes during the time period from on or about January 4, 2010, through the present. Law enforcement officers typically began their surveillance at Johnson and Scanes's residence in the morning, observed them get into a vehicle and followed them. Often, officers observed Johnson and Scanes park in a residential area in or around Camden and Pennsauken, get out of their vehicle and approach various residential mailboxes. Officers frequently observed Johnson or Scanes reach toward the mailboxes. However, because the surveillances necessarily had to be conducted at a distance, officers generally could not see if any mail was taken. Generally, after having engaged in this activity, officers observed Johnson and Scanes return to their apartment at 258 Branch Village. Generally, officers conducting surveillances later in the day observed Johnson and/or Scanes and others (presumably check cashers) enter Universal Foto Id, a Camden identification business.
- 13. For example, on or about February 19, 2010, officers observed a four door Pontiac G6 with North Carolina registration ZNJ3432 parked in front of Johnson and Scanes' residence at 258 Branch Village. Investigation revealed that the Pontiac G6, North Carolina Registration No. ZNJ3432 was registered to Enterprise Rental, and had been rented on February 2, 2010 to "Nathaniel Brown," through Enterprise Rental in North Carolina. During the day, law enforcement officers observed Nathaniel Johnson and Lakisha Scanes approach numerous mailboxes at various addresses in Camden, and then return to their home at 258 Branch Village, Camden. Later that day, law enforcement officers observed Nathaniel Johnson walking into the Universal Photo at 2411 Federal Street, Camden, New Jersey.
- 14. During another surveillance on or about March 1, 2010, law enforcement officers observed Nathaniel Johnson and Lakisha Scanes exit their residence at 258 Branch Village and enter a 2009 white Mercedes C300, North Carolina Registration No. MXT7743, which is a rental car. Johnson was wearing a green jacket and black pants and Scanes was wearing a multi-colored sweater. At approximately 11:00 a.m., Postal Inspectors were called to respond to the 1400 block of Bradley Avenue in Camden on the report of a black male and black female going through mailboxes in the area. Upon arriving at the 1400 block of Bradley Avenue, Postal Inspectors were told by the U.S. Mail carrier, that two individuals got out of a white Mercedes and were seen on Bradley

Avenue going through mailboxes. A resident of the 1400 block of Bradley Avenue, C.T., told law enforcement officers that he/she normally receives a Social Security check on the first of the month, and the check was not in the mailbox when he/she retrieved the mail. The resident, C.T., also stated that there were two Pathmark Grocery Store fliers in his/her mailbox. Law enforcement officers interviewed the U.S. Mail carrier assigned to that route, who stated that he deposited the resident C.T.'s Social Security check into his/her mailbox earlier that day, and also that he did not place any Pathmark fliers into that mailbox.

- 15. Later that day, March 1, 2010, at approximately 1:20 p.m., law enforcement officers observed Nathaniel Johnson and Lakisha Scanes in the same white Mercedes Benz in the area of Argus and Constitution Roads in Camden. An officer observed Johnson approach one mailbox. In addition, officers interviewed a resident, R.S., who stated that he/she observed a black male in a green jacket going through mailboxes, and also observed a woman he/she knew to be "Lakisha" standing on the corner with fliers in her hand.
- 16. The same day, March 1, 2010, at approximately 5:00 p.m., law enforcement officers were called to 5th and Elm Streets in Camden, in response to a report of individuals driving a white Mercedes going through residential mailboxes. Law enforcement officers interviewed the U.S. Mail carrier for the area, who stated that he saw two individuals, a black male with a green jacket and another individual with a black jacket covering a multi-striped shirt underneath, putting papers into mailboxes. The carrier stated the two individuals walked toward the 600 block of Elm Street when a resident, T.L., confronted the carrier stating that his/her Supplemental Security Income ("SSI") check was not in his/her mailbox. The mail carrier stated that he recalled putting the resident's SSI check into his/her mailbox. The mail carrier further stated that he saw the two individuals get into the white Mercedes and flee the scene, almost hitting the resident, T.L., who chased after them. Law enforcement officers also interviewed T.L., who stated that he/she was awaiting her SSI check, which was not in his/her mailbox.
 - a. THE FIRST PHOTOARRAY Shortly after identifying Nathaniel Johnson as a suspect in the robberies of the U.S. Mail vehicles, I created an eight person photoarray which included a photograph of Johnson from 2004. At the time, Johnson was significantly heavier, and also six years younger. During the interview of T.L. on March 1, 2010, I showed T.L. the photoarray which included the old photograph of Johnson as #6, and reviewed the standard U.S. Postal Inspection Service Photo Array Guidelines with T.L. After reviewing all eight of the photographs, T.L. pointed to photo #6 (Johnson) and stated that the man in the green shirt looked like him, but the face of the black male with the green shirt was thinner. Accordingly, T.L. did not identify any photograph in the photoarray as the black male in the green shirt.

- b. THE SECOND PHOTOARRAY I prepared another photoarray with a more recent photograph of Nathaniel Johnson (taken in 2009) as #7. On March 3, 2010, law enforcement officers re-interviewed T.L. in reference to the incident on March 1, 2010, instructed T.L. in accordance with U.S. Postal Inspection Service guidelines, and showed T.L. the second photoarray. T.L. identified photo #7 as the man in the green shirt who was approaching mailboxes and then initialed and dated the photoarray below the photo.
- On March 3, 2010, law enforcement officers conducted another surveillance of Johnson 17. and Scanes, starting at their residence at 258 Branch Village, Camden, New Jersey. Officers observed Johnson and Scanes leave their residence and get into a black Mercedes bearing North Carolina Registration No. YWW4995, registered to "Nathaniel Brown," 2461 Stevenson Drive, Raleigh, North Carolina 27610. Later that day, at approximately 12:35 p.m., I conducted a mobile surveillance on the black Mercedes beginning at the intersection of Baird Avenue and Park Boulevard. Johnson was wearing a black jacket and a white bandana on his head, and Scanes was wearing a bright yellow long sleeved shirt. I followed the vehicle to Garden Avenue in Pennsauken, New Jersey, and observed Scanes exit the vehicle. I saw Scanes approach the residence of either 3710 or 3720 Garden Avenue, look into the mailbox, and take what appeared to be two white parcels which were located on the doorstep of the residence. I saw Scanes return to the black Mercedes and put the parcels in the back of the Mercedes. Shortly thereafter, I located the mail carrier for that location and he told me that he had placed two parcels on the doorstep of 3710 Garden Avenue.
- 18. On or about March 31, 2010, law enforcement officers observed a black 1991 Mercedes SW, with North Carolina Registration No. ZSX2507 parked directly in front of Johnson and Scanes' apartment at 258 Branch Village. Records show that the 1991 Mercedes is registered to Nathaniel Eugene Brown, 2461 Stevenson Drive, Raleigh, North Carolina 27610, and was purchased on March 26, 2010. Officers observed Nathaniel Johnson get into the Mercedes wearing a red bandana and a white and black plaid jacket at approximately 9:50 a.m.. Johnson drove to the Pathmark Food located at 2881 Mount Ephraim Avenue, Camden, New Jersery, and parked directly in front of the store. I observed Johnson enter the outer doors of the store and grab a handful of Pathmark advertisements, depart the store and return to his vehicle.

IDENTIFYING CHECK CASHERS

- 19. In an attempt to identify the check cashers, law enforcement officers took the surveillance photographs of the check cashers obtained from Ben's Check Cashing and distributed them to various law enforcement officers in and around Camden.
- 20. On or about March 11, 2010, I received a telephone call from another law enforcement officer saying that he thought he had seen one of the check cashers on Broadway in

Camden. I immediately went to Broadway, and spoke to the officer who pointed out an individual later identified as G.M.

COCONSPIRATOR G.M. ADMITTED TO PARTICIPATING IN THE THEFT OF MAIL AND FRAUDULENT PASSING OF CHECKS WITH JOHNSON AND SCANES

- 21. Immediately thereafter, another law enforcement officer and I approached G.M. and asked him if he would speak with us. G.M. agreed and accompanied us to our Office located in Bellmawr, New Jersey. Although he was not in custody, I advised G.M. of his Miranda rights and he executed a written waiver of the same.
- 22. During that March 11, 2010 interview, G.M. stated the following, in substance and in part:
 - a. G.M. is a drug dealer and heroin user.
 - b. G.M. met Nate, and a woman he believed to be Nate's girlfriend, through G.M.'s acquaintance, Nana later identified as J.F. while G.M. was hanging out on Broadway in Camden.
 - C. Nana asked G.M. if he would like to make some quick money by cashing checks. G.M. agreed and got into the car with Nate, the girlfriend, Nana and three "dopesick whores." Nate drove them to a photo identification place at 24th and Federal Streets in Camden (known to law enforcement as Universal Foto ID, 2411 Federal Street). Nate filled out the paperwork and paid \$35 for G.M. and the others to have fraudulent identification documents made in the names of others. Nate then took G.M. and the others to Ben's Check Cashing in Camden, handed G.M. and the others signed checks, and instructed G.M. and the others about when to go into the store and cash the checks. G.M. cashed the check, came out of the store and handed the money to the girlfriend. The girlfriend paid G.M. \$50 for cashing the check.
 - d. G.M. admitted that he cashed approximately eight checks for Nate and his girlfriend, and he identified photographs of himself from the identification documents and surveillance photographs that officers had obtained from Ben's Check Cashing.
 - e. G.M. stated that Nate and his girlfriend paid him and the other check cashers varying amounts depending upon the face value of the check \$50 for checks under \$500, \$100 for checks greater than \$500, and \$300 for checks over \$1000.

- f. G.M. explained that Nate, Nate's girlfriend and Nana recruited him and other street people in the city of Camden to cash the checks.
- g. G.M. stated that Nate bragged that he cashed so many checks at the United Check Cashing store in the Fairview Square Section in Camden, New Jersey, that the store had to close.
- h. At the request of law enforcement officers, G.M. read the U.S. Postal Inspection Service's photo array guidelines and stated he understood them. Then officers showed G.M. the second photo array, and G.M. positively identified the individual he knew as "Nate" as the seventh photo in the array. The seventh photo is a photo of Nathaniel Johnson. G.M. initialed and dated the photo array.
- i. Officers showed G.M. photographs of check cashers obtained from Ben's Check Cashing. G.M. was able to loosely identify approximately five of the other check cashers, by a combination of street names and locations where they were known to hang out.
- 23. On March 30, 2010, another law enforcement officer and I interviewed G.M. again because we had received information from other check cashers that G.M. had been involved in the thefts of mail from the U.S. Postal vehicles. During that interview, in substance and in part, G.M. admitted the following:
 - a. G.M. participated in the theft of mail from U.S. Postal vehicles on two occasions.
 - b. The first theft occurred in the Cramer Hill area of Camden near a Catholic school. G.M. stated that he was in Keisha's² car a white Acura with Keisha and an unknown black male driving around Camden while Nate was in North Carolina. G.M. stated that Keisha was desperate for money and she suggested that they break into a mail truck and steal mail. Keisha gave G.M. a hammer and a bag to use. G.M. stated that he smashed the window of a mail truck, took two tubs of mail, and got back into Keisha's car. G.M., Keisha and the other male went to Keisha's apartment in Branch Village with the stolen mail. While in Keisha's apartment, G.M. watched Keisha sort through the stolen mail. Keisha paid G.M. approximately \$200 -\$300 for his role in the theft.
 - i. G.M.'s statements correspond to the January 11, 2010 theft at approximately 4:00 p.m. at 27th and Arthur Streets, see supra at ¶ 6f.

²During the first interview, G.M. referred to Nate's girlfriend only as "girlfriend," but during the second interview, G.M. referred to her as Keisha.

- c. The second time G.M. participated in the theft of mail from a U.S. Mail vehicle, G.M. was in the white Acura with Nate and Keisha near Nate's apartment when Nate saw a mail truck on Jefferson Street and asked G.M. to break into it. G.M. broke the window of the mail vehicle, stole two or three tubs of mail, and got back into the car. They all went back to Nate's apartment, and G.M. watched while Nate and Keisha sorted through the stolen mail. Nate paid G.M. approximately \$380 for his part in the break in.
 - G.M.'s statements correspond to the January 29, 2010 theft, see supra at ¶
 6h.
- 24. I reinterviewed G.M. on March 31, 2010, because I wanted to confront him about the earlier break in on January 11, 2010. During that interview, G.M. stated the following, in substance and in part:
 - a. G.M. denied participating in the break in during the morning hours of January 11, 2010, explaining that he had been "dope-sick."
 - b. G.M. admitted, however, that he was with Nate on another occasion in the Fairview section of Camden before the other two thefts, when Nate asked him to break the window of the U.S. Mail vehicle and steal mail. G.M. stated that he did break a window of a postal vehicle, but that he did not take any mail because another mail vehicle drove by. G.M. got back into Nate's car and they fled the scene.
 - i. G.M.'s statements correspond to the December 19, 2009 incident, see supra at ¶ 6a.

IDENTIFYING OTHER CHECK CASHERS

- 25. Based upon the investigation, including the information provided by G.M., law enforcement officers attempted to locate and interview additional check cashers.
- 26. On or about March 26, 2010, I interviewed A. A., who stated, in substance and in part, that:
 - a. She was a prostitute.
 - b. She was recruited by a black male later identified as Nathaniel Johnson, his wife, the person identified as G.M., and another individual who was later identified as J.F., to cash a check for money.

- c. The black male drove A.A. to Universal Foto ID on Federal Avenue in Camden to obtain a photo identification in another person's name. The black male paid for the identification, and then took A.A. to Ben's Check Cashing, where she cashed a check and was paid \$200 by the wife.
- 27. On or about April 1, 2010, another law enforcement officer and I interviewed Nana, J.F., who stated in substance and in part:
 - a. J.F. met Nate through his girlfriend Lakisha, who was a childhood acquaintance, in or about December 2009. J.F. identified the photograph of Nathaniel Johnson from the second photo array as the person she knows as Nate.
 - b. J.F. knows Nate to use the surnames Johnson and Brown.
 - c. J.F. stated that immediately after she met Nate, she began cashing checks for him and Lakisha. J.F. estimated that she cashed between 15 to 20 checks for Nate and Lakisha and received approximately \$4,000 -\$5,000 from them for doing so. J.F. stated that Nate kept the checks in the glove compartment of the car while he was driving.
 - d. J.F. stated that they would obtain false identification bearing the name and address of the payee on the check from Universal Foto ID or another identification business, and then would cash the checks at Ben's Check Cashing, United Check Cashing in Fairview Square, and other check cashing businesses in Philadelphia, Chester and Delaware.
 - e. J.F. stated that Nate and Lakisha used numerous others to cash checks, many of whom were drug addicts and prostitutes, and identified several of them by street name and hang-out locations. J.F. admitted she is a drug user.
 - f. J.F. stated on a "normal" day, J.F. would go to Nate and Lakisha's residence at 258 Branch Village, and would babysit their son while Nate and Lakisha would go "mail hopping" meaning stealing mail.
 - g. J.F. further stated that when Nate and Lakisha returned to their residence, they would bring the stolen mail inside the house, open the mail, and Lakisha would write down the names of the payees on the checks on small pieces of paper. J.F. stated that Lakisha wrote the payees names and addresses on paper so that they could more easily obtain photo identifications for the check cashers who they would later use to cash the checks.
 - h. J.F. stated she has been inside Nate and Lakisha's residence at 258 Branch Village, Camden, New Jersey on numerous occasions and has seen various checks

- inside that apartment in different names, and has also seen a handgun and bullets. J.F. stated that Nate told her that he has the gun for protection.
- i. According to J.F., the last time J.F. cashed a check for Nate was in the beginning or middle of March 2010. J.F. stated that she cashed a \$9,000 Federal Income Tax return check in the name of C.K. from Palmyra, New Jersey. Nate drove J.F. to North Carolina, put J.F. up in a hotel using C.K.'s name, and had J.F. cash the check while in North Carolina. J.F. stayed in North Carolina for approximately three days in the hotel alone, got tired of waiting for Nate, and took a bus back to New Jersey.

LAKISHA DEPOSITED A VICTIM'S CHECK INTO HER OWN BANK ACCOUNT

- 28. On or about March 31, 2010, a victim, S.L., contacted law enforcement to report that her December 2009 New Jersey Unemployment check in the amount of \$774 had been stolen and cashed fraudulently. According to S.L., S.L. received a telephone call from an employee from Bank of America asking whether S.L. had given a "Lakisha Quijano" permission to deposit a \$774 check into Quijano's personal checking account. S.L. stated that she told the Bank of America employee that she did not give Quijano permission to deposit S.L.'s check. S.L. further stated that in light of the conversation with the Bank of America employee, she recalled the flyers sent out by law enforcement officers about missing mail, and called to report the incident.
- 29. Law enforcement officers obtained records from Bank of America which revealed that S.L.'s New Jersey Unemployment check #67862649 in the amount of \$774 was deposited in account #3299842528 held by Lakisha Quijano, 2461 Stevens Road, Raleigh, North Carolina 27610. The check was endorsed S.L. and Lakisha Quijano.